UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BURBERRY LIMITED; GIANNI VERSACE, S.R.L.; HERMÈS INTERNATIONAL; and LOUIS VUITTON MALLETIER,

Plaintiffs,

-against-

VARIOUS JOHN DOES, JANE DOES, and XYZ COMPANIES,

Defendants.

CIVIL ACTION NO. 21 CV 06104 (JSR)

PRELIMINARY INJUNCTION ORDER

This action having been commenced by Burberry Limited; Gianni Versace, S.r.l.; Hermès International; and Louis Vuitton Malletier (collectively "Plaintiffs") on July 16, 2021 against Defendants Various John Does, Jane Does, and XYZ Companies, at 1220 Broadway, Room 700, New York, NY 10001; 265 West 37th Street, Room 206, New York, NY 10018; and 265 West 37th Street, Floor 12a, Unmarked Room at End of Hall, New York, NY 10018, alleging trademark counterfeiting and infringement of Plaintiffs' Federally Registered Trademarks (defined below) and charging defendants with, *inter alia*, trademark counterfeiting, infringement, dilution and false advertising, and a copy of the Summons, Complaint, Seizure Order, and supporting papers having been served upon the defendants during civil seizures at the following locations on December 17, 2019: 1220 Broadway, Room 700, New York, NY 10001; and 265 West 37th Street, Floor 12a, Unmarked Room at End of Hall, New York, NY 10018 (collectively, "Defendants");

It appearing to the Court that it has jurisdiction over the subject matter of this action, over Plaintiffs and over Defendants;

The Court having considered the Complaint and the exhibit thereto, Plaintiffs' Order To Show Cause and accompanying papers and the Defendants failing to appear at the hearing on July 26, 2021 after receiving notice of the same on July 21, 2021; and

It further appears that Defendants are, *inter alia*, counterfeiting and infringing Plaintiffs' Federally Registered Trademarks, in violation of 15 U.S.C. § 1114 and will continue to counterfeit and infringe Plaintiffs' Federally Registered Trademarks unless restrained by Order of this Court.

Accordingly, the Court concludes as a matter of law:

- 1. This Court has jurisdiction over the subject matter of all counts of this action and over all the parties hereto;
- 2. Plaintiffs have established a *prima facie* case of ownership of Plaintiffs' Federally Registered Trademarks;
- 3. Plaintiffs are likely to prevail on the merits of this action in showing that Defendants are counterfeiting and infringing Plaintiffs' Federally Registered Trademarks in violation of 15 U.S.C. § 1114;
- 4. Defendants' actions have caused and will continue to cause immediate and irreparable harm, loss, and damage before a full trial on the merits can be held, in that monetary compensation will not afford adequate relief to Plaintiffs for Defendants' continuing acts of counterfeiting and trademark infringement;
- 5. The harm to Plaintiffs from the denial of this request for a Preliminary Injunction would outweigh the harm to the legitimate interests of Defendants against whom the Order would be issued and to any third parties; and
- 6. The public interest would best be served by granting this Preliminary Injunction prior to a full trial on the merits or a default judgment against Defendants.

NOW THEREFORE, it is hereby ORDERED as follows that:

- 1. The Defendants and their respective principals, officers, agents, servants, employees, and attorneys, and all persons in concert and participation with them are hereby restrained and enjoined, pending termination of this action:
 - (a) From using Plaintiffs' Federally Registered Trademarks, including but not limited to:

BURBERRY LIMITED

TRADEMARK TRADEMARK	REGISTRATION NUMBER	REGISTRATION DATE	GOODS
BURBERRY	259,571	6-Aug-1929	Piece goods - namely, cloths, and stuffs of wool, worsted, or hair.
BURBERRY	260,843	27-Aug-1929	Clothing - namely, coats and topcoats for men, women, and children; breeches for boys; suits for men and boys; waistcoats for men, women, and children; overalls for women and children; skirts for outer wear for women and children; capes for men, women, and children; hats and caps for men, women, and children; bonnets for children, hoods and toques for men, women, children; neckties for men, women, and children; women, and children; stockings and socks for men, women, and children; braces and suspenders for men and children; belts for outer wear for men, women, and children; boots of rubber and fabric or combinations of these materials for men, women, and children; shoes and slippers of leather, rubber, and fabric or combinations of these materials for men, women, and children; gloves for men, women, and children; of leather and fabric.
BURBERRY	1,133,122	15-Apr-1980	Handbags, travelling bags, leather travelling cases, attache cases, leather briefcases, purses, pocket wallets, umbrellas.
BURBERRY	1,607,316	24-Jul-1990	Spectacles, sunglasses, fitted cases, frames and lenses, all for sunglasses or for spectacles.
BURBERRY	1,747,765	19-Jan-1993	Wrist watches and straps and bracelets

			therefor, and cuff links.
BURBERRY	2,624,684	24-Sep-2002	Retail store services featuring clothing, watches, sunglasses, accessories, shoes, luggage, leather goods, and fragrance.
BURBERRY	2,629,931	8-Oct-2002	Fragrance; non-medicated toilet preparations, namely, perfumes, eau de cologne, and toilet water, cosmetic preparations for the hair, namely, shampoos, soaps for the body, shower gels and bath gels and bath foams; antiperspirants and deodorants; shaving preparations.
BURBERRY	2,875,336	17-Aug-2004	Sunglasses, combined sunglasses, spectacles, optical glasses, fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; parts and fittings for all the aforesaid goods; cases and holders for portable computers and mobile telephones; watches, clocks and parts and fittings for all the aforesaid goods, wrist watches and straps and bracelets therefor and pocket watches, jewelry, imitation jewellery, tie-pins and cuff links; and jewelry boxes, hat and shoe ornaments all made of precious metal or coated therewith.
BURBERRY	3,879,249	23-Nov-2010	Articles of outer clothing, namely, coats, jackets, rainwear, ponchos, gilets, detachable coat linings, raincoats; blousons; casual coats; polo shirts; blouses; dresses; pyjamas; knitwear, namely, jerseys, jumpers, cardigans, sweaters, knitted leggings; shorts; trousers; suits; skirts; jackets; articles of underclothing, namely, boxer shorts, lingerie, loungewear, nightwear, underwear, undergarments; hosiery; headwear; footwear; sports clothing, namely, sweat pants, sweat shirts, swimwear; sports footwear; tracksuits; ready-made linings, namely, finished textile linings for garments; ties; clothing belts; wraps; scarves; shawls and stoles; gloves.
BURBERRY	3,898,440	4-Jan-2011	Articles made from material and textile, namely, bed blankets, blanket throws, children's blankets, lap blankets, towels, handkerchiefs, cushion covers.
BURBERRY	4,004,568	2-Aug-2011	Cosmetics; aftershave preparations; non-medicated preparations for the bath and shower, body care preparations, skin care preparations, nail care preparations and accessories; room fragrances; baby creams, lotions, shampoos.

BURBERRY	4,212,001	25-Sep-2012	Visual and audio recordings featuring music, video, animation, voice, still photography; digital music downloadable from the internet; custom manufacture of clothing, custom manufacture of accessories, namely, bags, briefcases, handbags, wallets, purses, document holders, bags and cases for makeup, key rings, luggage, umbrellas, cases and holders for electronic devices, eyewear and cases for eyewear, belts; entertainment services, namely, production and online distribution of sound, music, and video recordings in the fields of music and fashion; providing non- downloadable music and video recordings in the fields of music and fashion for others via a global computer network; production and distribution of videos in the fields of music and fashion; design of clothing and fashion accessories for others.
BURBERRY	510,077	24-May-1949	Clothing - namely, coats and topcoats for men, women, and children; jackets for men, women, and children; breeches for boys; suits for men and boys; waistcoats for men, women, and children; skirts for outer wear for women and children; capes for men, women, and children; hats and caps for men, women, and children; bonnets for children; hoods and toques for men, women, and children; neckties for men, women, and children; stockings and socks for men, women, and children; braces and suspenders for men and children; belts for outer wear for men, women, and children; boots for men, women, and children, of leather and rubber or combinations of these materials; shoes and slippers for men, women, and children; of leather, rubber, and fabric or combinations of these materials; gloves for men, women, and children of leather and fabric.
BURBERRY	6,331,235	27-Apr-2021	Protective industrial respiratory masks; Protective clothing for medical purposes; respiratory masks for medical use; sanitary masks for medical purposes; disposable sanitary masks for virus isolation purposes; sanitary masks made of cloth for medical purposes; face protection shields for medical purposes
BURBERRY BRIT	3,029,220	13-Dec-2005	Non-medicated toilet preparations, namely, perfumes, eau de cologne, and toilet water, shower gels and bath gels and bath foams; antiperspirants and deodorants; shaving preparations.

		27.7. 2011	01.11
BURBERRY BRIT	3,910,300	25-Jan-2011	Clothing, namely, shirts, polo shirts, dresses, jumpers, sweaters, gilets, t-shirts, jeans, coats, trench coats, jackets.
BURBERRY CHECK	1,241,222	7-Jun-1983	Coats, top coats, jackets, trousers, slacks, waistcoats, skirts, capes, hats, bonnets, berets, shirts, scarves, shawls and blouses.
BURBERRY CHECK	1,855,154	20-Sep-1994	Watches and parts therefor; straps, bracelets for wrist watches; cuff links.
BURBERRY CHECK	2,015,462	12-Nov-1996	Socks.
BURBERRY CHECK	2,022,789	17-Dec-1996	Suitcases, traveling bags, holdalls, suit and garment carriers for travel, attache cases, document cases, briefcases, purses, drawstring pouches, wallets, billfolds, passport holders, key cases, handbags, shoulder bags, credit card cases, business card cases, toilet bags sold empty, toilet cases sold empty, shaving bags sold empty, tie cases for travel, umbrellas and parasols; traveling comforter, namely, fabric blanket-like articles for keeping warm, e.g., when traveling in cold climates, or for use as a stadium blanket; clothing for men and women, namely, scarves, pullovers, cardigans, sweaters, overcoats, raincoats, shirts, belts; slippers for men.
BURBERRY CHECK	2,845,852	25-May-2004	Sunglasses, spectacles, optical glasses; fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; carrying cases and holders for portable computers and mobile telephones.
BURBERRY CHECK	3,529,814	11-Nov-2008	Non-metal key fobs; blankets, throws, handkerchiefs, textile used as linings for clothing and accessories, fabrics for use in the manufacture of clothing, footwear, headwear, hosiery, belts, bags, cases, holders and key rings, umbrellas, watches, jewelry, towels, blankets, throws; Coats, detachable coat linings, rainwear, ponchos, jackets, gilets, jerseys, jumpers, sweaters, blouses, shirts, polo shirts, t-shirts, vests, dresses, skirts, trousers, jeans, shorts, ski wear, sports shirts, sports trousers, sweat shirts, waterproof clothing, namely, coats, jackets, bikinis, sarongs, swimwear, bathrobes, boxer shorts, loungewear, nightwear, undergarments, ties, cravats, footwear, shoes, boots, athletic footwear, slippers, ballet slippers, socks, leggings, caps, hats, head scarves, belts, gloves, mufflers, scarves, shawls, stoles, pashminas, children's and infant's clothing,

			namely, coats, jackets, ponchos, jerseys, sweaters, blouses, shirts, t-shirts, singlets, vests, tank tops, waistcoats, suits, dresses, skirts, trousers, jeans, shorts, children's headwear, children's swimwear, children's nightwear, children's under garments, and one-piece clothing, headwear, footwear; cloth bibs; teddy bears; retail store services in the fields of clothing, accessories, footwear, headgear, luggage, leather goods, timepieces, jewelry, eyewear and fragrances.
BURBERRY CHECK	4,123,508	10-Apr-2012	Telephones, mobile telephones, mobile electronic devices, namely, PDAs (personal digital assistants), smart phones, personal entertainment devices, namely, electronic book readers, tablet computers, netbooks, electronic notebooks, handheld computers, portable digital audio and/or video players, and accessories for the foregoing, namely, headsets, headphones, covers, fascia, lanyards specially designed for mobile electronic devices and mobile telephones, stylus, battery chargers, phone jewelry and accessory charms for mobile electronic devices; cases and holders for telephones, mobile telephones and mobile electronic devices, namely, for PDAs (personal digital assistants), smart phones, personal entertainment devices in the nature of electronic book readers, tablet computers, netbooks, electronic notebooks, handheld computers and portable digital audio and/or video players.
BURBERRY CHECK	4,166,277	3-Jul-2012	Non-medicated toilet preparations; cosmetic preparations for the bath and shower; non-medicated body and skin care preparations; cosmetic preparations for care of teeth and for hair; nail care preparations and polish; nail accessories, namely, false nails; soaps; antiperspirants, deodorants; perfumes, eau de cologne, eau de toilette and toilet water; essential oils, massage oil; pot pourri, room fragrance and incense; cleaning preparations for leather and non-leather goods; sunglasses, spectacles, optical glasses, fitted frames and lenses for the aforesaid goods, cases and holders for the aforesaid goods, and parts and fittings for all the aforesaid goods; cases and holders specially adapted for use with portable electronic devices, mobile telephones, portable audio and video systems and computers; camera cases; mobile phones and mobile phone accessories, namely, mobile phone covers and skins, charms and lanyards for mobile phones, mobile phone fascias in

			the nature of protective covers; watches, clocks and parts, fittings and cases for all the aforesaid goods; watch straps and bracelets therefore; jewellery, imitation jewellery, tiepins, tie clips and cuff links; articles made of precious metals or coated therewith, namely, key rings, charms, badges, shoe ornaments; jewellery boxes and cases; models and figures of precious metal; all-purpose carrying bags, trunks, valises, suitcases, travelling bags, garment bags, baby bags, baby carriers worn on the body, baby harnesses worn on the body, rucksacks, satchels, holdalls, handbags, shoulder bags, shopping bags, wheeled shopping bags; purses, pouches; wallets, key holders made of leather or imitations of leather, credit card holders of leather and imitations of leather; pochettes; labels, luggage labels and tags all made of leather and imitations of leather; cosmetic cases and bags sold empty, cases for manicure sets sold empty; jewellery rolls for travel; umbrellas, parasols; clothing for pets; horse blankets; collars and leashes for animals; textiles and textile items, namely, bed blankets, bed
			pillowcases; quilts and eiderdowns; bed sheets; table covers; unfitted fabric furniture covers, wall hangings, cushion covers; placemats of textile; handkerchiefs; travelling rugs; pet blankets; textile labels; clothing, namely, shirts, polo shirts, blouses, dresses, shorts, trousers, suits, skirts, jerseys, jumpers, sweaters, cardigans, gilets, t-shirts, singlets, vests, tank tops, waistcoats, jeans, pyjamas, coats, overcoats, trench coats, casual coats, raincoats, jackets, ponchos, blousons, capes, lingerie, underwear, undergarments, sleepwear, loungewear; ski wear, sports trousers, sports shorts, sports shirts, sports jackets, sweat pants, sweat shirts, sweat shorts, tracksuits, swimwear; ready-made linings sold as component parts of coats; clothing belts; ties, wraps, serapes, sarongs, scarves, shawls and stoles; gloves; tights, socks, stockings, hosiery, leggings; footwear; headwear.
BURBERRY CHECK	2,689,921	25-Feb-2003	Perfumes, eau de toilettes, body lotion; soaps; personal deodorants; eau de parfums; aftershaves; shampoo for the body; shower gels; bath gels.
BURBERRY CHECK (No	2,728,709	24-Jun-2003	Fabrics for use in the manufacture of clothing, underclothes, swimwear, headwear, footwear,

Color)			hosiery, socks; and belts; fabrics for use in the manufacture of cosmetic cases and bags, toiletry cases and bags, and shaving cases and bags; fabrics for use in the manufacture of purses, pouches, bags, luggage, carriers, travel bags, and suit and garment bags; fabrics for use in the manufacture of cases and holders for money, documents, keys, glasses, and ties; fabrics for use in the manufacture of umbrellas and parasols and cases thereof; fabrics for use in the manufacture of straps and bracelets for watches, and straps for shoes and bags; fabrics for use in the manufacture of lining for all the foregoing goods; comforters and blankets.
BURBERRY CHECK (No Color)	2,612,272	27-Aug-2002	Retail store services in the fields of clothing, accessories, shoes, luggage, leather goods and fragrances.
BURBERRY CHECK (No Color)	2,732,617	1-Jul-2003	Perfumes, eau de toilettes, eau de parfums; body lotion, soaps; personal deodorants; aftershave; shampoo for the hair and for the body; shower gels; bath gels; articles of luggage, namely, suitcases, athletic and sport bags, beach bags, carry-on bags, clutch bags; duffel and gym bags; overnight bags; school book bags, shoulder bags, tote bags, garment bags for travel, carryall bags, traveling bags, hand bags, leather bags for computers and cameras; wallets and purses; toiletry bags sold empty and cosmetics bags sold empty; brief cases, satchels and portfolios; parasols, umbrellas, walking sticks; leather key fobs, leather key holders; articles of outerclothing, namely, coats, overcoats, trench coats, casual coats, raincoats, jackets and blousons, poloshirts, blouses, dresses, pyjamas, knitwear namely, jumpers, sweaters, gilets, knitted shirts, knitted skirts and knitted scarves; and shorts, trousers, suits, skirts, underclothes, hosiery, headwear, footwear, sports clothing namely, sports trousers, sports shorts, sports shirts, sports jackets, sports footwear; tracksuits, garments that can be attached to or detached from coats, raincoats, trench coats, or casual coats for additional warmth; ties, belts, wraps, serapes, scarves, shawls and stoles, gloves.
BURBERRY CHECK (No Color)	4,441,542	26-Nov-2013	Sunglasses, camera cases, spectacles, optical glasses, mobile phone accessories, namely, mobile phone covers charms and lanyards for mobile phones; fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; parts and fittings for all the

BURBERRY LONDON	3,202,484	23-Jan-2007	aforesaid goods; cases and holders for portable electronic devices, namely, PDAs (personal digital assistants), smart phones, electronic book readers, tablet computers, netbooks, electronic notebooks, handheld computers and portable digital audio and/or video players, mobile telephones, portable audio and video systems and computers; Watches, watch straps and bracelets therefor; jewelry, imitation jewelry, tie-pins, tie clips and cuff links; articles made of precious metals or coated therewith, namely, key rings. Articles of outerclothing, namely, coats, trench coats, casual coats, jackets; shirts,
EQUESTRIAN KNIGHT DEVICE	2,512,119	27-Nov-2001	Non-medicated toilet preparations, namely, perfumes, eau de cologne, and toilet water, shampoos, shower gels and bath gels; shaving preparations; articles of luggage, namely, suitcases, athletic and sport bags, beach bags, carry-on bags, clutch bags, overnight bags, shoulder bags, tote bags, carryall bags, traveling bags, hand bags, leather bags for computers and cameras; wallets and purses; toiletry bags sold empty and cosmetic bags sold empty; brief cases, satchels and portfolios; cases for personal organizers and for mobile telephones; umbrellas, leather key fobs, leather key holders, and dog coats.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	863,179	7-Jan-1969	Coats, topcoats, jackets, suits, trousers, slacks, shorts, overalls, skirts, capes, hats, caps, bonnets, hoods, berets, neckties, stockings, socks, belts, boots, shoes, slippers, sandals, gloves, shirts, collars, pajamas, dressing gowns, cardigans, sweaters, pullovers, scarves, blouses, beach robes, dresses, skiwear, and handkerchiefs.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	1,622,186	13-Nov-1990	Sunglasses; spectacles; frames and lenses.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	2,952,399	17-May-2005	Sunglasses, combined sunglasses, spectacles, optical glasses, fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; parts and fittings for all the aforesaid goods; computer carrying cases and specialty holsters and cases for carrying mobile telephones; watches, and parts and fittings for all the aforesaid goods, wrist watches and straps and bracelets therefor and jewelry, imitation jewelry, tie-pins and cuff

			links; and jewelry boxes, all made of precious metal or coated therewith.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	4,036,908	11-Oct-2011	Accessories for covers, and accessory charms for mobile electronic devices; cases and holders for telephones, mobile telephones and mobile electronic devices, namely, smart phones, personal entertainment devices, tablet computers.
EQUESTRIAN KNIGHT DEVICE w/ BB PRORSUM	1,903,508	4-Jul-1995	Watches and parts therefor; bracelets for wrist watches; jewelry; costume jewelry; tie pins and cuff links.
EQUESTRIAN KNIGHT DEVICE w/ BB PRORSUM	3,766,097	30-Mar-2010	Textiles and textile goods, namely, household linen, bed linen, bath linen, bed blankets, blanket throws, children's blankets, beach towels, handkerchiefs, unfitted fabric furniture covers, fabrics for textile use and textile used as lining for clothing, cushion covers.
TB DEVICE	6,376,182	08-Jun-2021	Leather and imitations of leather bags, namely, handbags, shoulder bags, tote bags, clutch bags, holdalls, travel bags, waist bags, weekend bags, school bags, overnight bags; articles of luggage, namely, trunks being luggage, trunks being travelling trunks; valises, suitcases, travelling bags, garment bags for travel, vanity cases sold empty; allpurpose carrying bags, athletic and sports bags, beach bags, carry-on bags, duffel and gym bags, overnight bags, school book bags, satchels, bum-bags; textile, string, leather, reusable, canvas, and mesh shopping bags; baby bags, namely, baby carrying bags, bags for carrying babies' accessories, nappy bags; baby carriers worn on the body, pouch baby carriers; baby harnesses being baby carriers worn on the body, baby harnesses being leashes for guiding children; wheeled shopping bags, trolleys in particular general purpose sport trolley bags; purses; drawstring, felt, leather, textile, and cloth pouches; wallets; cosmetic cases and bags sold empty, cases for manicure sets sold empty; key holders being key cases made of leather or imitations of leather, key holders being pouches for holding keys; card holders being credit card holders, business card holders in the nature of card cases, and business cardholders in the nature of wallets; labels of leather for luggage, and luggage labels made of leather and imitations of leather, leather tags; pochettes; tie cases; leather boxes; umbrellas, parasols; clothing for pets; horse

	blankets; collars and leashes for	animals;
	clothing, namely, coats, finished	detachable
	coat linings, rainwear, ponchos, jac	ckets, gilets,
	jerseys, jumpers, sweaters, blous	ses, shirts,
	polo shirts, t-shirts, vests, tan	k tops,
	waistcoats, dresses, skirts, trouse	ers, jeans,
	shorts, ski wear, ski gloves, spo	rts shirts,
	sports trousers, sports singlets, sv	veat shirts;
	waterproof clothing, namely, bath	ing trunks,
	swimming trunks, trunks being	
	bikinis, sarongs, swimwear, bathro	obes, boxer
	shorts, loungewear, nightw	ear,
	undergarments, ties as clothing	, cravats,
	leggings, pashmina shawls; child	
	infant's clothing, namely, coats	
:	ponchos, jerseys, sweaters, blouse	
	shirts, vests, dresses, skirts, trous	
	shorts, children's headwear, ch	
	swimwear, children's nightwear,	
	under garments, and one-piece clo	
	bibs; footwear, shoes, boots, athlet	
	slippers, ballet slippers; headwea	
	caps, baseball caps, hats, head sca	
	gloves, mufflers as neck scarves	
	shawls, stoles, pocket squares; b	elts being
	clothing	

GIANNI VERSACE, S.r.l.

TRADEMARK	REGISTRATION	REGISTRATION	GOODS and SERVICES
	DATE	NUMBER	
VERSACE	Dec. 16, 1997	2121984	Class 3: cosmetics, namely, day cream, bathfoam, after-shave, deodorants for men and women, perfumed, unperfumed (natural) and hypoallergenic perfumes, cologne, toilet water, fragrances, namely, perfume, toilet water and essence oils for personal use for men and women
			Class 18: leather or imitations of leather, namely, animal skins and hides, handbags, wallets, luggage, attache cases, tote bags, briefcases, all purpose sport bags, travelling trunks and carry-on bags, shoulder bags, garment bags for travelling, keycases, umbrellas
			Class 25: clothing for men, women and children, namely belts, coats, raincoats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, suits, shirts and chemises, T-shirts, sweaters, underwear, socks and stockings, gloves, ties, scarves, hats and caps, boots, shoes and slippers

Aug. 2, 2005 Class 3: Cosmetics, namely night and day creams, cleaning preparations for the care of the face and body, bath-foam, shaving foam, aftershaves, foundation makeup, nail polish, deodorants for men and women, hand abody soaps, hair shampoos and rinses, hair spray, toothpaste and fragrances, namely perfume, toilet water and essential oils for personal use for men and women Class 8: Tableware, namely cutlery; forks, knives and spoons; sterling silver table forks, knives and spoons; domestic fireplace bellows Class 9: Optical instruments, apparatus and equipments, namely eyeglasses; reading glasses, and optical glasses; sunglasses; spectacles; spectacles frames; monocles; lorgnettes Class 11: Apparatus for lighting, namely, electric lighting fixtures for use on ceilings, chandeliers, electric, incandescent, and halogen light bulbs, safety lamps, candle, electric, oil, and portable page lanterns, standard lamps; fireplaces; decorative water fountains; lamps Class 14: Articles made of precious metals and alloys of precious metals with or without precious stones, namely rings, necklaces, bracelets, brooches, earrings,	<u>TRADEMARK</u>	REGISTRATION	REGISTRATION NUMBER	GOODS and SERVICES
cases made of precious metal, watches, clocks, chronometers, watch cases, costume jewelry Class 18: Leather and imitation of leather sold in bulk, handbags, wallets, luggage, attache cases, tote bags, briefcases, sport bags, traveling trunks, carry-on bags, shoulder bags, garment bags for traveling, key cases, umbrellas, parasols, walking sticks, whips, harnesses, saddlery; leather key chains Class 19: Fireplace surround; floor tiles; wood tile floors; glass tiles; parquet flooring; statuettes of stone, concrete, or		<u>DATE</u>	NUMBER	Class 3: Cosmetics, namely night and day creams, cleaning preparations for the care of the face and body, bath-foam, shaving foam, aftershaves, foundation makeup, nail polish, deodorants for men and women, hand and body soaps, hair shampoos and rinses, hair spray, toothpaste and fragrances, namely perfume, toilet water and essential oils for personal use for men and women Class 8: Tableware, namely cutlery; forks, knives and spoons; sterling silver table forks, knives and spoons; domestic fireplace bellows Class 9: Optical instruments, apparatus and equipments, namely eyeglasses; reading glasses, and optical glasses; sunglasses; spectacles; spectacles frames; monocles; lorgnettes Class 11: Apparatus for lighting, namely, electric lighting fixtures for use on ceilings, chandeliers, electric, incandescent, and halogen light bulbs, safety lamps, candle, electric, oil, and portable paper lanterns, standard lamps; fireplaces; decorative water fountains; lamps Class 14: Articles made of precious metals and alloys of precious metals with or without precious stones, namely rings, necklaces, bracelets, brooches, earrings, tie clips, cuff-links, diamonds, jewelry cases made of precious metal, watches, clocks, chronometers, watch cases, costume jewelry Class 18: Leather and imitation of leather sold in bulk, handbags, wallets, luggage, attache cases, tote bags, briefcases, sport bags, traveling trunks, carry-on bags, shoulder bags, garment bags for traveling, key cases, umbrellas, parasols, walking sticks, whips, harnesses, saddlery; leather key chains Class 19: Fireplace surround; floor tiles; wood tile floors; glass tiles; parquet flooring; statuettes of stone, concrete, or
marble; non-metal wall panels				marble; non-metal wall panels

TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
	DATE	TOTABLE	Class 20: Furniture; mirrors, namely looking glasses; picture frames; chairs; cupboards; cushions; desks; divans; plastic and wood doorknobs; figures of bone, ivory, plaster, plastic, wax and wood; plastic and wood furniture handles for doors, plastic key chains; magazine racks; office furniture; pillows; fitted furniture covers
			Class 21: Household or kitchen utensils and containers, namely, dinnerware; beverage-ware; glassware; sugar bowls; beer mugs; bottle openers; bowls; candle holders not of precious metal; china ornaments; cookware, namely non-electric frying pans; corkscrews; soap dispensers; figurines in China, crystal, earthenware, glass, porcelain and terracotta; holders for flowers and plants; perfume atomizers sold empty; plates; pots; soapboxes; soap holders; vases; flower baskets; porcelain and earthenware doorknobs and furniture handles for doors
			Class 24: Fabric for textile use, fabric of imitation animal skins, fabric for boots and shoes, bath linen; bed linen; blankets; curtains; unfitted furniture covers; handkerchiefs; kitchen towels; textile wall hangings
			Class 25: Clothing for men, women and children, namely belts, coats, raincoats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, suits, shirts and chemises, T-shirts, sweaters, underwear, socks and stockings, gloves, ties, scarves, hats and caps, boots, shoes and slippers
			Class 27: Carpets, rugs, mats and matting, linoleum and other materials for covering existing floors; non-textile wall hangings; non-textile wall decorations
	Jan. 2, 2007	3194501	Class 3: bath foam, deodorants for men and women, fragrances, namely, perfume,
"Greca Design"			toilet water
			Class 9: glasses, sunglasses, spectacles, spectacle frames, and cases
			Class 14: Articles made of precious metals and alloys of precious metals, with or without precious stones, namely, rings,

TRADEMARK	REGISTRATION	REGISTRATION	GOODS and SERVICES
	<u>DATE</u>	<u>NUMBER</u>	necklaces, bracelets, earrings, tie clips, cuff-links, watches, costume jewellery
			Class 16: writing and marking instruments, namely, pens
			Class 18: Leather and imitation leather goods, namely, handbags, wallets, luggage, attaché cases, tote bags, briefcases, sport bags, traveling trunks, carry-on bags, shoulder bags, garment bags for traveling
			Class 24: Fabric for textile use, fabric for boots and shoes, bath linen, bed linen; bed blankets; unfitted fabric furniture covers
			Class 25: Clothing for men, women and children, namely belts, coats, raincoats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, suits, shirts and chemises, t-shirts, sweaters, underwear, socks and stockings, gloves, ties, scarves,
			hats and caps, boots, shoes and slippers
	Jun. 24, 2008	3453992	Class 3: bath foam, after shaves, deodorants for men and women, fragrances, perfume
	,		Class 9: glasses, sunglasses, spectacles
"Greca Element Design"			Class 18: Leather and imitation leather goods, namely, handbags, wallets, luggage, tote bags, key cases
			Class 20: Furniture; mirrors, namely, looking glasses; cushions; desks; divans; office furniture; pillows; parts and fittings for the aforesaid furniture goods, namely, fitted furniture covers not of paper
			Class 24: bath linen; bed linen; bed blankets
			Class 25: Clothing for men, women and children, namely, belts, coats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, shirts and chemises, T-shirts, underwear, socks and stockings, gloves, ties, scarves, hats and caps, shoes and slippers
			Class 26: clothing buttons

TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
"Lion Head Design"	Apr. 4, 2017	5173618	Class 3: Cosmetics, including night and day creams; preparations for cleaning the face and body; bath foam; shaving foam after shave; make-up foundations; lip gloss; shoe wax; mascara; cosmetic masks; eyebrow pencils; pencils for cosmetic purposes, nail varnish; deodorants for men and women, hand and body soap, shampoo and hair coloring preparations in the nature of tints; hair lotions and lotions for cosmetic purposes; hair lacquers; dentifrices, fragrances; perfumery, eau de Cologne, lavender water, scented water being perfumery and essential oils for personal use, for men and women; bases for flower perfumes in the nature of essential oils; sun-tanning preparations being cosmetics; cosmetic preparations for baths; feminine hygiene cleansing towelettes; feminine deodorant sprays; skincare cosmetics; make-up preparations; cleaning agents for household purposes; shaving preparations; non-medicated toiletries; make-up removing preparations; talcum powder, for toilet use
			Class 9: Optics, namely, spectacles; sunglasses, optical glasses; goggles for sports; optical frames; monocles; theatre glasses; optical goods, namely, glasses and lenses; containers for contact lenses; eyeglasses cases; pince-nez cords; optics, namely, magnifying glasses; correcting optical lenses; optical lenses; lenses for eyeglasses; frames for glasses; electronic schedulers in the nature of electronic agendas; computers, handheld computers; data processing equipment in the nature of a computer mouse; mouse mats; computer keyboards; portable telephones; downloadable ring tones for mobile phones; cell phone straps Class 14: Jewelry, precious stones; horological and chronometric instruments; rings being jewelry; cuff links; bracelets being jewelry; watch bands; watch cases; clock cases; watch chains; jewelry chains; pendants; necklaces being jewelry; chronographs for use as timepieces; timepieces; stopwatches; chronoscopes; diamonds; tie pins; figurines in the nature of statuettes of precious metal; gold thread

TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
			jewelry; wire of precious metal, namely, precious metal jewelry chains; silver thread jewelry; cloisonné jewelry; badges of precious metal; clock hands for clock-and watchmaking; alloys of precious metal; ingots of precious metals; movements for clocks and watches; medals; lockets being jewelry; earrings; jewelry of yellow amber, ivory jewelry; jewelry ornaments; ornaments of jet; shoe ornaments of precious metal; hat ornaments of precious metal; pendulum clocks; atomic clocks; wristwatches; pocket watches; master clocks; electric clocks and watches; jewelry stones; trinkets or fobs, namely, key rings of precious metal; dials for clock and watch making; boxes of precious metal; cases for clock- and watchmaking; jewelry cases, namely, jewelry caskets and boxes; presentation cases for watches, namely, cases adapted for holding watches; pins being jewelry; ornamental pins; jewelry brooches; statuettes of precious metal; paste jewelry being costume jewelry; time instruments, namely, watches, clocks; alarm clocks; watch crystals
			Class 18: Leather and imitations of leather; animal skins, hides; women's handbags; pocket wallets; luggage; garment carriers in the nature of garment bags for travel; rucksacks; document cases; sports bags; trunks being luggage; travelling trunks; carry-on bags; sling bags; clothing bags in the nature of garment bags for travel; valises; suitcases; attaché cases; purses; travelling handbags; notecases, namely, business card cases; key cases; umbrellas; parasols; beach parasols; walking sticks; alpenstocks; whips; harness for horses; saddlery Class 25: Clothing, namely shirts, pants, jeans, sweaters, skirts, dresses; footwear; headgear, namely, headwear; clothing of imitations of leather, namely, pants, jackets; clothing of leather, namely, pants, jackets; motorists' clothing, namely, motorists' jackets, driving gloves; cyclists' clothing, namely, biking shorts, athletic shirts, cycling gloves; clothing for gymnastics, namely, leotards, leggings; gowns; bath robes; bandanas being

TRADEMARK	REGISTRATION	REGISTRATION	GOODS and SERVICES
	<u>DATE</u>	NUMBER	
			scarves; berets; underclothing; smocks, boas being necklets; teddies being undergarments; garters; sports shoes; stockings; slippers; socks; jodhpurs; shortsleeve shirts; stuff jackets being clothing; top hats; coats; hoods being clothing; belts for clothing; money belts being clothing; tights; collars being clothing; detachable collars; suits; beachwear; ties; ascots; headbands for clothing; pocket squares; dress handkerchiefs in the nature of pocket squares; jackets being clothing; jumper dresses; girdles; gloves being clothing; arm length gloves; mackintoshes; knitwear, namely knit shirts, knit skirts, knit dresses, knit sweaters, knit jackets; jersey clothing, namely, shirts, pants, dresses; leg warmers; leggings being trousers; liveries; sports jerseys; hosiery; swimsuits; pullovers; muffs being clothing; maniples; pelerines; mantillas; sleep masks; miniskirts; cowls being clothing; boxer shorts; bathing drawers; vests, trousers; parkas; pelisses; furs, namely, fur cloaks, fur coats; shirt yokes; pajamas; wristbands being clothing; ponchos; sock suspenders; brassieres; sandals; bath sandals; shoes; bath slippers; gymnastic shoes; beach shoes; shawls; sashes for wear, underpants; wimples; topcoats; outerclothing, namely, jackets, coats, vests; petticoats; slips being undergarments; shirt fronts; ankle boots; boots; fur stoles; T-shirts; combinations being clothing; uniforms; veils being clothing; visors being headwear; wooden shoes Class 26: Lace and embroidery, ribbons and braids; buckles for clothing; shoe fasteners; blouse fasteners, namely, snaps and buttons for blouses; shoe buckles; frills for attachment to clothing; lace for edgings for clothing; hook and eye fastening tape; clothing hooks; hooks for corsets; shoe hooks; tinsels as trimmings for clothing; buttons; stud buttons for duvets; stud buttons for shoes; collar studs, namely bonnet pins, hair pins, hat pins and needles; borders and edgings for clothing; hem tape for clothing

TRADEMARK	REGISTRATION	REGISTRATION	GOODS and SERVICES
	<u>DATE</u>	NUMBER	
	DATE	NUMBER	Class 35: Advertising services; business management; business administration services; providing office functions; dissemination of advertisements; dissemination of advertising matter; rental of advertising space; commercial and industrial business management assistance and consultancy; professional business consulting; modelling for advertising or sales promotion; franchising, namely, services rendered by a franchisor, that is transfer of business and organizational consultancy assistance in the development and management of a commercial enterprise; provision of information concerning commercial sales of fashion goods; retail store services and on-line retail store services for others featuring cosmetics, spectacles, mobile telephones, jewelry, clocks and watches, bags, accessories of leather, clothing, footwear, haberdashery articles; presentation of goods on communications media, namely, providing television home shopping services in the field of general consumer merchandise; electronic commerce services, namely, providing information about products via telecommunication networks for advertising and sales purposes; online retail store services featuring cosmetics, spectacles, mobile telephones, jewelry, clocks and watches, bags, accessories of leather, clothing, footwear, haberdashery articles; retail store services featuring cosmetics, spectacles, mobile telephones, jewelry, clocks and watches, bags, accessories of leather, clothing, footwear, haberdashery articles; retail store services featuring cosmetics, spectacles, mobile telephones, jewelry, clocks and watches, bags, accessories of leather, clothing, footwear, haberdashery articles; retail store services featuring cosmetics, spectacles, mobile telephones, jewelry, clocks and watches, bags, accessories of leather, clothing,
"Lion Head Design"	Aug. 1, 2017	5253199	Class 14: Jewellery, precious stones; horological and chronometric instruments; jewelry, namely, rings; cuff links; jewelry, namely, bracelets; watch bands; watch cases being parts of watches; clock cases being parts of clocks; watch chains; jewelry chains; pendants; jewelry, namely, necklaces; chronographs as watches; timepieces; stopwatches; chronoscopes; diamonds; tie pins; figurines, namely, statuettes of precious metal; gold thread jewelry; jewelry, namely, wire in the nature of threads of precious metal; jewellery; jewelry, namely, silver thread; jewellery; jewelry, namely, cloisonné jewellery;

TRADEMARK	REGISTRATION	REGISTRATION	GOODS and SERVICES
	DATE	NUMBER	badges of precious metal; clock- and watchmaking items, namely, clock hands; alloys of precious metals; movements for clocks and watches; medals; jewelry, namely, lockets; earrings; jewellery of yellow amber; ivory jewelry; jewelry, namely, ornaments; ornaments of jet; shoe ornaments of precious metal; hat ornaments of precious metal; hat ornaments of precious metal; pendulum clocks; atomic clocks; wristwatches; pocket watches; master clocks; electric clocks and watches; jewellery stones; key rings in the nature of trinkets and fobs of precious metal; dials for clock-and-watchmaking; boxes of precious metal; cases for clock- and watchmaking, namely, cases being parts of watches and clocks; jewelry cases in the nature of caskets or boxes; presentation cases for watches being parts of watches, pins being jewelry; ornamental pins; jewelry, namely, brooches; statuettes of precious metal; costume jewelry, namely, paste jewelry; time instruments, namely, watches, clocks; alarm clocks; watch crystals Class 18: Leather and imitations of leather; animal skins and hides; women's handbags; pocket wallets; luggage; garment carriers, namely, garment bags for travel; rucksacks; document cases; sports bags; luggage, namely, trunks; travelling trunks; carry-on bags; sling bags; garment bags for travel; valises; suitcases; attaché cases; purses; travelling handbags; business card cases; key cases, umbrellas; parasols; beach parasols; walking sticks; alpenstocks; whips; harness for horses; saddlery Class 25: Clothing, namely, shirts, pants, jeans, sweaters, dresses; footwear; headgear, namely, headwear, hats, caps; clothing of imitations of leather, namely, pants, jackets; clothing of leather, namely, pants, jackets; motorists' clothing, namely, biking shorts, athletic shirts, bicycling gloves; clothing for gymnastics, namely, bandanas; berets; underclothing; smocks; necklets, namely, boas;

TRADEMARK	REGISTRATION	REGISTRATION	GOODS and SERVICES
	DATE	NUMBER	
			undergarments, namely, teddies; garters; sports shoes; stockings; slippers; socks; jodhpurs; short-sleeve shirts; shirts; clothing, namely, stuff jackets; top hats; coats; clothing, namely, hoods; belts for clothing; clothing, namely, money belts;
			tights; clothing, namely, collars; detachable collars; suits; beachwear; ties; ascots; headbands for clothing; pocket squares; dress handkerchiefs, namely, pocket squares; clothing, namely, jackets;
			skirts; jumper dresses; girdles; clothing, namely, gloves; arm length gloves; mackintoshes in the nature of raincoats; knitwear, namely, knit shirts, knit skirts,
			knit dresses, knit sweaters, knit jackets; clothing, namely, jerseys; leg warmers; trousers, namely, leggings; liveries; sports jerseys; hosiery; swimsuits; pullovers; clothing, namely, muffs; maniples; pelerines; mantillas; sleep masks;
			miniskirts; clothing, namely, cowls; boxer shorts; bathing drawers; vests; trousers; parkas; pelisses; fur clothing, namely, fur jackets, fur coats, fur cloaks; shirt yokes; pyjamas; clothing, namely, wristbands; ponchos; sock suspenders; brassieres;
			sandals; bath sandals; shoes; bath slippers; gymnastic shoes; beach shoes; shawls; sashes for wear; underpants; wimples; topcoats; outerclothing, namely, jackets, coats, vests; petticoats; undergarments, namely, slips; shirt fronts; ankle boots; boots; fur stoles; T-shirts; clothing,
			namely, combinations; uniforms; clothing, namely, veils; headwear, namely, visors; wooden shoes
			Class 26: Lace and embroidery, ribbons and braids; clothing accessories, namely, clothing buckles; shoe fasteners; blouse fasteners; shoe buckles; frills for attachment to clothing; lace for edgings; hook and eyes; haberdashery, namely, clothing hooks; hooks for corsets; shoe hooks; tinsels in the nature of lace as trimmings for clothing; buttons; press
			buttons for duvets; press buttons for shoes; snap fasteners; pins, namely, bonnet pins, hair pins, hat pins and needles; borders and edgings for clothing; items for hems on clothing, namely, hem tape

HERMÈS INTERNATIONAL

OWNER	TRADEMARK	Reg. Date	Reg. No.	REGISTRAR	Classes
HERMES INTERNATIONAL		2/29/1972	930149	USA	03
HERMES INTERNATIONAL		1/22/2013	4278653	USA	3, 6, 8, 9, 11, 12, 14, 16, 18, 20, 21, 22, 24, 25, 26, 27, 28, 34, 35, 41
HERMES INTERNATIONAL		12/29/1998	2213940	USA	08, 09, 21, 28, 34
HERMES INTERNATIONAL	HERMÈS	6/27/1939	368785	USA	08, 14
HERMES INTERNATIONAL		7/18/1939	369271	USA	14
HERMES INTERNATIONAL		8/1/1939	369681	USA	18
HERMES INTERNATIONAL		8/4/1987	1450841	USA	20
HERMES INTERNATIONAL		8/15/1939	370082	USA	21
HERMES INTERNATIONAL		3/9/1971	909653	USA	24
HERMES INTERNATIONAL		8/8/1939	369944	USA	25
HERMES INTERNATIONAL		10/8/1968	858299	USA	25
HERMES INTERNATIONAL		1/16/2007	3198963	USA	35
HERMES INTERNATIONAL		12/27/2005	3036116	USA	35
HERMES INTERNATIONAL		8/15/1978	1099896	USA	42
HERMES INTERNATIONAL		5/1/2001	2447278	USA	08, 09, 16, 20, 24, 28, 34
HERMES INTERNATIONAL		10/8/1985	1364533	USA	21
HERMES INTERNATIONAL		1/6/1970	883588	USA	03, 14, 18, 25
HERMES		1/16/2007	3198973	USA	35
INTERNATIONAL HERMES	HERMĒS	12/27/2005	3036117	USA	35
INTERNATIONAL HERMES INTERNATIONAL		9/24/2002	2623070	USA	37, 40, 41
HERMES INTERNATIONAL		8/15/1978	1099897	USA	42

Case 1:21-cv-06104-JSR Document 5 Filed 07/26/21 Page 23 of 33

					02 00 14
HERMES INTERNATIONAL		9/4/1984	1292597	USA	03, 09, 14, 16, 18, 24, 25, 28, 34
HERMES INTERNATIONAL		5/27/1975	1011908	USA	14
HERMES INTERNATIONAL		11/23/1993	1806107	USA	18
HERMES INTERNATIONAL	H	3/20/2001	2436099	USA	03, 08, 09, 14, 16, 18, 20, 24, 25, 28, 34
HERMES INTERNATIONAL	BIRKIN	9/6/2005	2991927	USA	16, 18
HERMES INTERNATIONAL		12/4/2007	3348789	USA	06, 08, 14, 16, 18, 21, 24, 25, 26, 28, 34
HERMES INTERNATIONAL	(H)	1/20/2009	3564868	USA	06, 08, 14, 16, 18, 20, 21, 22, 24, 25, 26, 28, 34
HERMES INTERNATIONAL	TERRE D'HERMES	4/11/2006	3079963	USA	03

Case 1:21-cv-06104-JSR Document 5 Filed 07/26/21 Page 24 of 33

HERMES INTERNATIONAL		4/27/2007	3233558	USA	06, 14, 18, 25, 26
HERMES INTERNATIONAL		4/27/2007	3233557	USA	06, 14, 18, 25, 26
HERMES INTERNATIONAL	LINDY	48/5/2008	3480825	USA	18
HERMES INTERNATIONAL		1/13/2009	3561331	USA	06, 14, 16, 18, 21, 25, 26, 34
HERMES INTERNATIONAL		3/29/2011	3936105	USA	18
HERMES INTERNATIONAL		4/5/2011	3939358	USA	18

HERMES INTERNATIONAL	7/26/11	4000067	USA	3, 14, 18, 25, 35
HERMES INTERNATIONAL	2/17/2015	4687132	USA	25, 26
HERMES INTERNATIONAL	7/21/2020	6105385	USA	14, 18, 25, & 26

LOUIS VUITTON MALLETIER

TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
Damier Trademark	2/17/2009	3576404	IC 018. G & S: Boxes of leather or imitation leather for packaging and carrying goods, trunks, suitcases, traveling sets comprised of matching luggage, traveling bags, luggage, garment bags for travel, toiletry cases sold empty, rucksacks, satchels, handbags, beach bags, leather shopping bags, sling bags, suit carriers, shoulder bags, waist bags, purses, travel cases, briefcases, briefcase-type portfolios, leather pouches, wallets, change purses, key cases, business card cases, calling card cases.
II X II	6/28/1994	1841850	IC 018. G & S: trunks; travelling trunks; suitcases; bags; namely, traveling bags; bags for climbers; bags for campers; rucksacks; haversacks; shopping bags; handbags; vanity cases; attache cases, satchels; pouches; briefcases; wallets; pocket wallets; card cases; bill and card holders; key holders; change purses; portfolios; and umbrellas.

TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
₩ ₩ ₩ ₩ ₩ ₩ ₩ Décor Floral	6/20/2006	3107072	IC 018. G & S: Leather and imitation leather products, namely, traveling bags, traveling sets comprised of bags or luggage, trunks and suitcases, garment bags for travel purposes; vanity cases sold empty, rucksacks, shoulder bags, handbags, attaché cases, document wallets and briefcases made of leather, pouches made of leather, wallets, purses, business card cases, credit card cases; umbrellas. IC 025. G & S: Clothing and undergarments, namely, belts, scarves shawls, jackets, sashes for wear, shoes, boots.
Flower	8/4/1998	2177828	IC 018. G & S: goods made of leather or imitations of leather are not included in other classes, namely, boxes made from leather, trunks, valises, traveling bags, luggage for travel, garment bags for travel, vanity cases sold empty, rucksacks, hand bags, beach bags, shopping bags, shoulder bags, attache cases, briefcases, and fine leather goods, namely, pocket wallets, purses, leather key holders, business card cases, calling card cases, and credit card cases, umbrellas.
			IC 025. G & S: clothing and underwear, namely shawls, stoles, belts, shoes, boots and sandals.
Flower in circle	8/18/1998	2181753	IC 018. G & S: goods made of leather or imitations of leather are not included in other classes, namely, boxes made from leather; trunks, valises, traveling bags, luggage for travel, garment bags for travel, vanity cases sold empty, rucksacks, hand bags, beach bags, shopping bags, shoulder bags, attache cases, briefcases, and fine leather goods, namely, pocket wallets, purses, leather key holders, business card cases, calling card cases, credit card cases, and umbrellas.
			IC 025. G & S: clothing and underwear, namely, shirts, waistcoats, raincoats, skirts, coats, pullovers, trousers, dresses, jackets, shawls, stoles, scarves, neckties, pocket squares, belts shoes, boots and sandals.
	10/14/2003	2773107	IC 018. G & S: Travel bags, travel bags made of leather; luggage trunks and valises, garment bags for travel, vanity-cases sold empty; rucksacks, shoulder bags, handbags; attache-cases, briefcases, drawstring pouches,

TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
Flower in Rhombus			pocket wallets, purses, umbrellas, business card cases made of leather or of imitation leather, credit card cases made of leather or of imitation leather; key holders made of leather or of imitation.
			IC 025. G & S: Clothing, namely, shirts, T-shirts, belts, scarves, neck ties, shawls, raincoats, overcoats, high-heeled shoes, low-heeled shoes, boots, tennis shoes.
LOUIS VUITTON	8/6/1996	1990760	IC 018. G & S: trunks; traveling trunks; suitcases; traveling bags; luggage; garment bags for travel; hat boxes for travel; shoe bags for travel; umbrellas; animal carriers; rucksacks; haversacks; leather or textile shopping bags; beach bags; handbags; vanity cases sold empty; attache cases; tote bags, travel satchels; clutch bags; briefcases; wallets; pocket wallets; credit card cases; business card cases; bill and card holders; checkbook holders; key cases; change purses; briefcase-type portfolios.
			IC 025. G & S: shirts; sweatshirts; polo shirts; T-shirts; headwear; jackets; ties; belts; shawls; scarves.
LOUIS VUITTON	8/10/1976	1045932	IC 018 Luggage and ladies' handbags.
LOUIS VUITTON	8/10/1976	4530921	IC 009 G & S: Optical apparatus, namely, binoculars; blank USB sticks; spectacles; sunglasses; spectacle frames; spectacle glasses; spectacle cases; accessories for telephones, mobile phones, smart phones, tablet devices, PDAs, and MP3 players, namely, covers, neck straps, neck cords, and bags and cases specially adapted for holding or carrying portable telephones and telephone equipment and accessories.
			IC 025. G & S: Clothing, namely, pullovers, vests, shirts, tee-shirts, trousers, jackets, suits, coats, rain coats, waterproof jackets, waterproof pants, overcoats, parkas, skirts, dresses, pajamas, dressing gowns, nightgowns, robe, gloves, neck ties, belts for clothing, leather belts, scarves, pocket squares, sashes for wear, shawls, stockings, socks, tights, braces for clothing, suspenders, stoles, underwear, lingerie, bathing suits; headwear; shoes; slippers; boots; half-boots.

TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
LOUIS VUITTON	12/7/2004	2909003	IC 009 G & S: Optical instruments and apparatus, namely, spectacles, eyeglasses, spectacle cases.
LOUIS VUITTON MALLETIER A PARES	10/2/1990	1615681	IC 018. G & S: traveling bags, trunks, valises, satchels, hat boxes and shoe boxes for travel, pouches and shoulder bags used for luggage, travel kits and vanity cases sold empty and used for luggage, rucksacks, shopping bags and beach bags in the nature of luggage, hand bags, pocketbooks, briefcases, briefcase-type portfolios, wallets, billfolds, passport cases, key cases, credit card cases, business card cases, change purses.
LOUIS VUITTON PARIS	5/2/2000	2346373	IC 018. G & S: Goods made of leather or of imitations of leather not included in other classes, namely, boxes of leather, trunks, valises, travelling bags, traveling sets for containing cosmetics, garment bags for travel, rucksacks, handbags, beach bags, shopping bags, shoulder bags, briefcases, pouches; fine leather goods, namely, pocket wallets, purses, key cases, card holders, checkbook holders. IC 025. G & S: Clothing and underwear, namely, sweaters, shirts, suits, waistcoats, skirts, coats, pullovers, trousers, dresses, clothing jackets, shawls, stoles, scarves, neckties, clothing belts, bathing suits,
			footwear; head wear and waterproof clothing, namely, raincoats.
LV Logo	9/30/2014	4617736	IC 009. G & S: Optical apparatus, namely, binoculars; blank USB sticks; spectacles; sunglasses; spectacle frames; spectacle glasses; spectacle cases; accessories for telephones, mobile phones, smart phones, tablet devices, PDAs, and MP3 players, namely, covers, neck straps, neck cords, and bags and cases specially adapted for holding
			or carrying portable telephones and telephone equipment and accessories.
V	9/28/1993	1794905	IC 025. G & S: clothing for men and women; namely belts, shawls, sashes, scarves; footwear headgear.
LV Logo			

TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
LV Logo	1/10/1989	1519828	IC 018. G & S: trunks, valises, traveling bags, satchels, hat boxes and shoe boxes used for luggage, hand bags, pocketbooks.
LV Logo	6/27/2000	2361695	IC 025. G & S: Clothing, namely, sweaters, shirts, sweatshirts, polo shirts, t-shirts, suits, waistcoats, raincoats, skirts, coats, pullovers, trousers, dresses, jackets, shawls, stoles, scarves, neckties, pocket squares, pocket handkerchief squares for wear, gloves, ties, belts, bathing suits, shoes, boots and sandals, hats.
LV Logo	12/7/2002	2909002	IC 009 G & S: Optical instruments and apparatus, namely, spectacles, eyeglasses, spectacle cases.
Toile Monogram	9/20/1932	0297594	IC 018. G & S: trunks, valises, traveling bags, satchels, hat boxes and shoe boxes used for luggage, hand bags, and pocketbooks.
Toile Monogram	10/31/2000	2399161	IC 025. G & S: Clothing and underwear, namely, shirts, polo shirts, t-shirts, waistcoats, raincoats, skirts, coats, trousers, dresses, jackets, shawls, stoles, scarves, neckties, gloves, ties, belts, bathing suits, shoes, boots and sandals, hats.

TRADEMARK	REGISTRATION DATE	REGISTRATION NUMBER	GOODS and SERVICES
	08/21/2012	4192541	IC 018. G & S: Boxes of leather or imitation leather for packaging and carrying goods; traveling bags; leather traveling sets of luggage; trunks; suitcases; garment bags for travel; vanity cases sold empty; toiletry bags sold empty; backpacks; handbags; attaché cases; leather document cases; wallets; purses; leather key cases.
			IC 025. G & S: Clothing, namely, underwear, shirts, tee-shirts, pullovers, skirts, dresses, trousers, coats, jackets, belts for clothing, scarves, sashes for wear, gloves, neckties, socks, bathing suits; footwear; headwear.

(hereinafter collectively referred to as "Plaintiffs' Federally Registered Trademarks");

- (b) From receiving, manufacturing, distributing, advertising, promoting, returning, offering for sale or otherwise disposing of in any manner, holding for sale or selling any goods, labels, tags, logos, decals, emblems, signs, and other forms of markings, any packaging, wrappers, pouches, containers and receptacles, and any catalogs, price lists, promotional materials and the like bearing a copy or colorable imitation of Plaintiffs' Federally Registered Trademarks;
- (c) From using any logo, trade name or trademark which may be calculated to falsely represent or which has the effect of falsely representing that the services or products of Defendants are sponsored by, authorized by, or in any way associated with Plaintiffs;
 - (d) From infringing Plaintiffs' Federally Registered Trademarks;
- (e) From falsely representing themselves as being connected with Plaintiffs or sponsored by or associated with Plaintiffs;
- (f) From using any reproduction, counterfeit, copy, or colorable imitation of Plaintiffs' Federally Registered Trademarks in connection with the publicity, promotion,

sale, or advertising of goods sold by Defendants including, without limitation, apparel, belts, cosmetics, eyewear, footwear, handbags, jackets, jewelry, perfumes, wallets, watches, and other products bearing a copy or colorable imitation of Plaintiffs' Federally Registered Trademarks;

- (g) From affixing, applying, annexing, or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent such goods as being those of Plaintiffs and from offering such goods in commerce;
- (h) From using any trademark or trade name in connection with the sale of any goods which may be calculated to falsely represent such goods as being connected with, approved by or sponsored by Plaintiffs; and
- (i) From destroying, altering, disposing of, concealing, tampering with or in any manner secreting any and all business records, invoices, correspondence, books of account, receipts or other documentation relating or referring in any manner to the manufacture, advertising, receiving, acquisition, importation, purchase, sale or offer for sale, or distribution of any merchandise bearing Plaintiffs' Federally Registered Trademarks.
- 2. Defendants, their principals, officers, agents, servants, employees and attorneys and all persons in active concert or participation with them are hereby enjoined, from transferring, discarding, destroying or otherwise disposing of the following currently in the possession, custody or control of Defendants:
 - (a) All merchandise bearing any copy or counterfeit of Plaintiffs' Federally Registered Trademarks or any markings substantially indistinguishable therefrom;

- (b) All labels, tags, logos, emblems, watch faces, signs, and other forms of markings, all packaging, wrappers, pouches, containers, receptacles, and all advertisements, catalogs, price lists, guarantees, promotional materials and the like bearing any copy or counterfeit of Plaintiffs' Federally Registered Trademarks or any markings substantially indistinguishable therefrom, and all plates molds, dies, tooling, machinery, assembly equipment and other means of making the same; and
 - (c) All books and records showing:
 - (i) Defendants manufacture, receipt and sale of merchandise bearing Plaintiffs' Federally Registered Trademarks; and
 - (ii) Defendants' manufacture, receipt and sale of any labels, tags, logos, decals, emblems, signs, and other forms of markings, any packaging, wrappers, pouches, containers and receptacles, and any catalogs, price lists, guarantees, promotional materials and the like bearing Plaintiffs' Federally Registered Trademarks, either by reference to such trademarks or by style or code number or otherwise.
- 3. The parties may take immediate and expedited discovery, limited to document requests and interrogatories, without regard to the time limitations set forth in Rules 30, 33, 34 and 36 of the Federal Rules of Civil Procedure.
- 4. The seizures outlined in the opening paragraph are hereby confirmed, and the counterfeit goods seized pursuant to the Court's Seizure Order may be destroyed after the appropriate 10 days' notice is given to the United States Attorney for the Southern District of New York, as provided for in 15 U.S.C. § 1118.
- 5. Service of this Order by first-class mail to the Defendants or by leaving a copy of this Order at each of Defendants' business addresses identified in the opening paragraph shall

Case 1:21-cv-06104-JSR Document 5 Filed 07/26/21 Page 33 of 33

constitute sufficient service of this Order. Service shall be deemed complete on the mailing or delivery of this Order as permitted above.

6. All papers under seal in this action are now unsealed.

Dated: July <u>36</u>, 2020

SO ORDERED:

EDS. RAKOFF

UNITED STATES DISTRICT JUDGE